

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 14 C 18
)	
SECURITY FENCE CO., INC.,)	JUDGE SARA L. ELLIS
an Illinois corporation,)	
)	
Defendant.)	

AMENDED MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, SECURITY FENCE CO., INC., an Illinois corporation, in the total amount of \$24,240.73, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,844.75.

On January 15, 2014, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on February 5, 2014. On March 12, 2014, the Court entered default against Defendant, ordered Defendant to submit to a payroll compliance audit, and set the case for prove up on May 28, 2014.

Plaintiffs were able to obtain the check stubs from Defendant's covered employees, and now request that the Court enter judgment based on said check stubs, in lieu of a payroll compliance audit.

/s/ Patrick N. Ryan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Amended Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 19th day of March 2014:

Mr. Jeffrey H. Cole, Registered Agent/President
Security Fence Co., Inc.
2022 S. Griswold
Peoria, IL 61605

/s/ Patrick N. Ryan _____

Patrick N. Ryan
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: pryan@baumsigman.com